



October 13, 2017

Regulatory Policy Unit
Health Workforce Planning and Regulatory Affairs Division
56 Wellesley St. W., 12th Floor
Toronto, ON M5S 2S3

Dear Madam or Sir:

Re: Proposed Regulation of Diagnostic Medical Sonographers

Thank you for taking the time to review this submission from the Association of Ontario Midwives (AOM) to the proposed regulations under the Medical Radiation Technology Act and the Regulated Health Professions Act to regulate diagnostic medical sonographers.

Registered Midwives in Ontario provide comprehensive primary care to pregnant women and their newborns. Midwives have provided personalized, excellent care for more than 180 000 Ontarians since 1994. Midwives order ultrasounds, rely on ultrasound reports in making clinical decisions, and apply ultrasound for fetal heart rate surveillance and simple diagnostics (e.g., confirming the fetus's presentation at the end of pregnancy or in labour).

As the professional association representing all 800 Ontario midwives, the AOM supports the proposed regulation of diagnostic medical sonographers. As the Health Professions Regulatory Advisory Council noted in its Final Report on Diagnostic Sonography:

The potential risk, therefore, is that the diagnostic sonographer may not recognize and communicate to a physician [or midwife] the key ultrasound images necessary for a proper diagnosis. As noted by one stakeholder to HPRAC, "in high-risk obstetrics people are making life and death decisions based on our findings. If I miss the abnormality — the families may be impacted for life."

Midwives and their clients rely on the expertise and competence of medical sonographers and support the regulation of medical sonographers to mitigate this risk of harm.

Additionally, we support the amended exemption for midwives under Regulation 107/96, which clarifies that they can both order and apply soundwaves for diagnostic ultrasound, as

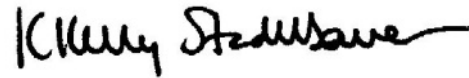
midwives have been doing since their regulation in 1994. This will support midwives to continue to provide high quality care to their clients by ordering prenatal and postpartum ultrasounds and by applying ultrasound to monitor fetal well-being.

Thank you very much for the opportunity to provide this submission. We look forward to working with regulated diagnostic medical sonographers in the future.

Sincerely,



Elizabeth Brandeis, RM
President
Association of Ontario Midwives



Kelly Stadelbauer, RN, BScN, MBA
Executive Director
Association of Ontario Midwives